

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**  
*Philadelphia Division*

IN RE:

SIMONA S. ROBINSON

Case No. 24-13606-pmm  
Chapter 13

The Bank of New York Mellon f/k/a The Bank of New York as successor in interest to JPMorgan Chase Bank, National Association, as Trustee for GSRPM Mortgage Pass-Through Certificates, Series 2003-1,  
Movant

vs.

SIMONA S. ROBINSON ,  
Debtor

**OBJECTION TO CONFIRMATION  
OF DEBTOR'S CHAPTER 13 PLAN**

The Bank of New York Mellon f/k/a The Bank of New York as successor in interest to JPMorgan Chase Bank, National Association, as Trustee for GSRPM Mortgage Pass-Through Certificates, Series 2003-1 ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtor's Chapter 13 Plan* (Doc 3), and states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on October 8, 2024.
2. Movant holds a security interest in the Debtor's real property located at 3029 South 70th Street, Philadelphia, PA 19151 (the "Property"), by virtue of a Mortgage.
3. The Debtor filed a Chapter 13 Plan (the "Plan") on October 8, 2024 (Doc 3).
4. It should be noted that the Debtor's loan matures during the pendency of the Plan

period.

5. The Debtor needs to address how they will be dealing with this loan that matures. The debtor must indicate whether they intend to cure the arrears, take over the taxes and insurance and pay the debt as a total debt or continue to make monthly payments.

6. The Plan currently indicates that the debtor will be paying Movant outside the Plan. Movant objects to this treatment.

7. Although Movant has not yet filed its proof of claim, it is anticipated that the claim will show the Total Debt due Movant is \$57,840.96 plus interest.

8. The Debtor has filed a Plan in which the Debtor proposes to pay \$59,233.24 in arrears. This amount is listed in Part 4(b) instead of Part 4(c). Movant objects to the confirmation of the Debtor's proposed Chapter 13.

**WHEREFORE**, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439

Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

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Chase Bank, National Association, as Trustee for  
GSRPM Mortgage Pass-Through Certificates,  
Series 2003-1,  
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vs.

SIMONA S. ROBINSON ,  
Debtor

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing  
OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN has been  
electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

MICHAEL A. CIBIK, Debtor's Attorney  
1500 Walnut Street  
Suite 900  
Philadelphia, PA 19102  
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KENNETH E WEST, Bankruptcy Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107

Office of United States Trustee, US Trustee  
Robert N.C. Nix Federal Building  
900 Market Street, Suite 320  
Philadelphia, PA 19107

Via First Class Mail:

SIMONA S. ROBINSON  
3029 S 70TH ST  
PHILADELPHIA, PA 19142-2531

Date: October 28, 2024

/s/Andrew Spivack

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